

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BAY STATE GAS COMPANY

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D.T.E. 05-27

**PETITION TO INTERVENE OF THE UNITED STEELWORKERS
OF AMERICA, AFL-CIO-CLC**

Pursuant to 220 C.M.R. 1.03(1)(a), the United Steelworkers of America, AFL-CIO/CLC requests that the Department of Telecommunications and Energy ("Department") grant it leave to intervene as a party in the above-captioned docket.

As grounds therefore, the United Steelworkers of America, AFL-CIO/CLC ("Union") states:

1. Since December 1998, the Union has been the chief signatory to all collective bargaining agreements with Bay State Gas Company ("Company"), concerning the terms and conditions of employment of its affiliate local, USWA Local 12026 ("Local 12026").
2. The membership of Local 12026, is made up of all clerical and operations employees employed by the Company within the metropolitan area of Springfield, Massachusetts. Local 12026 members are assigned to work in the field, at the Company headquarters and at the Company Call Center serving Massachusetts, Maine, and New Hampshire.
3. The Department's Rules permit the grant of full participation to any party with a substantial and specific interest. 220 C.M.R. 1.03(1)(e).
4. The Steelworkers has a substantial and specific interest in the Company's proposed rate changes, insofar as changes in service quality have a direct effect on its members. The rate changes proposed may affect the wages, and/or other benefits of employment, received by its members.
5. The Steelworkers has a substantial and specific interest in the impact of the proposed rate changes insofar as potential changes in staffing may affect the occupational safety, health, and working conditions of its members. (A number of service quality standards, such as response time to fix gas leaks, may be directly impacted by staffing levels at the call centers.)
6. The Steelworkers has been granted party status in other, similar proceedings involving proposed rate changes.

7. No other party can adequately represent or address the Steelworkers' interests in this case.
8. The Steelworkers intends to participate as a full participant and take part in issues that may substantially and specifically affect its membership.
9. For the foregoing reasons, and for the same reasons that it was granted leave to intervene in prior Departmental dockets related to rate changes, the Steelworkers will be substantially and specifically affected by the Department's review and decision in this docket.

WHEREFORE, the Steelworkers, by and through its attorneys, respectfully requests that this Petition to Intervene be granted and that the United Steelworkers of America be accorded full participant intervention status in this proceeding.

Respectfully submitted,

UNITED STEELWORKERS OF
AMERICA,

By its attorneys,

/s/ Nicole Horberg Decter

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Dated: April 28, 2005

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2005, I caused a copy of the foregoing Petition To Intervene to be served by first class mail, postage pre-paid upon the following service list:

/s/ Nicole Horberg Decter
Nicole Horberg Decter

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